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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TRUSTEES OF THE ELECTRICAL
WORKERS HEALTH AND WELFARE
TRUST; TRUSTEES OF THE
ELECTRICAL WORKERS PENSION
TRUST; AND TRUSTEES OF THE LAS
VEGAS ELECTRICAL JOINT
APPRENTICESHIP AND TRAINING
TRUST FUND,

Plaintiffs,

vs.

CASINO SIGNS & GRAPHIC, INC., d/b/a
CASINO LIGHTING & SIGN, a Nevada
corporation,

Defendant.

CASE NO.

STIPULATED/CONSENT JUDGMENT

CASINO SIGNS & GRAPHIC, INC., d/b/a CASINO LIGHTING & SIGN, a Nevada corporation ("Employer"), hereby stipulates and consents to entry of judgment in favor of Plaintiffs, Trustees of the Electrical Workers Health and Welfare Trust; Trustees of the Electrical Workers Pension Trust; and Trustees of the Las Vegas Electrical Joint Apprenticeship and Training Trust Fund (collectively the "IBEW Joint Trust Funds"), and against Employer in the total sum of \$296,433 for delinquent employee benefit contributions, liquidated damages, and

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1 related costs and fees owed under the Employee Retirement Income Security Act of 1974
2 ("ERISA").

3 The parties have stipulated and therefore the Court finds:

4 1. Employer is signatory to and bound by the terms of a collective bargaining
5 agreement ("CBA") with the International Brotherhood of Electrical Workers, Local No. 357
6 ("Union"), in which Employer agreed to abide by the trust agreements establishing the respective
7 IBEW Joint Trust Funds and any amendments thereto ("Trust Agreements").

8 2. Under the CBA and the Trust Agreements, Employer is obligated to pay employee
9 benefit contributions to the IBEW Joint Trust Funds on behalf of Employer's bargaining unit
10 employees represented by the Union.

11 3. Based on remittance reports prepared and submitted by Employer for the months
12 of January 2011 through March 2011, Employer owes the IBEW Joint Trust Funds \$239,939 in
13 unpaid employee benefit contributions, past interest of \$6,756 (through April 5, 2011), liquidated
14 damages of \$47,988, administrative fees of \$750, and past attorney's fees of \$1,000, for a total of
15 \$296,433.

16 4. In addition, in the event this judgment must be executed, the IBEW Joint Trust
17 Funds will incur additional fees and costs determined by the parties to be at least \$5,000, which
18 are therefore included herein.

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5. This Stipulated/Consent Judgment is entered into by and between Employer and the IBEW Joint Trust Funds for employee benefit contributions and related costs and fees owed to the IBEW Joint Trust Funds by ERISA.

July 26, 2011.
April 26, 2011.

April 7, 2011.

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CASINO SIGNS & GRAPHIC, INC., d/b/a
CASINO LIGHTING & SIGN, a Nevada
corporation

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For Casino Signs & Graphics, Inc., d/b/a Casino
Lighting & Sign, a Nevada corporation

Attorneys for the IBEW Joint Trust Funds

JUDGMENT

Judgment is hereby entered against Casino Signs & Graphics, Inc., d/b/a Casino Lighting & Sign, a Nevada corporation, and in favor of the IBEW Joint Trust Funds in the amount of \$296,433.

Dated this 17th day of July, 2012.

U.S. DISTRICT COURT JUDGE

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